

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF S.O.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, S.O., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am a parent of Child A, an 11-year old in the fifth grade. We live in Seattle,
5 Washington.

6 3. Child A is transgender and nonbinary. Being nonbinary means that Child A does
7 not identify with any binary gender, including the gender they were assigned at birth. In
8 Child A's case, being transgender means that they have socially transitioned in order to express
9 a gender presentation that matches their nonbinary experience of gender, neither specifically
10 male nor female. In general, Child A uses they/them pronouns and experiments with a variety of
11 other pronouns that help them express their nonbinary gender identity.

12 4. Child A was assigned male at birth. One afternoon when child A was
13 approximately six years old, we were reading a children's storybook together, in which the main
14 character does not clearly present as boy or girl. My child asked if the character was a boy or a
15 girl. I said that I didn't know, because it wasn't clear from the story, and that it's possible to be
16 neither boy nor girl. Child A responded, "oh, that sounds like me. I am not really a boy, but I'm
17 not a girl, either." This led to a discussion of what it means to be transgender and non-binary.
18 The self-confidence and joy that accompanied discovering they could use pronouns that aren't
19 gendered, and choose a new name for themselves as part of transitioning to a new gender identity,
20 cannot be understated. My spouse and I discussed names we had considered for them before they
21 were born, and they chose one that they liked. They have consistently used this name and
22 genderless pronouns for the past five years.

23 5. Since Child A came out as trans/non-binary, they have fiercely maintained that
24 gender identity. It is an ongoing conversation, a journey that we live every day. Every time
25 anyone calls them by their chosen name or refers to them as "they," every day when Child A
26 chooses to wear clothes that are neither stereotypically masculine or feminine, Child A affirms

1 their gender identity and feels more seen, more accepted, more comfortable with their place in
2 this world. As a parent, it is beautiful and gratifying to see your child find their authentic self,
3 and my kid knows themselves very well.

4 6. Child A told us that they wanted to be called by their new chosen name and
5 pronouns at school. We contacted the school to let them know. We did not receive the support
6 in the school community we hoped for. Child A's teachers had trouble with their pronouns. Child
7 A did not want to play sports with the boys, and they were not accepted by the girls. They were
8 stuck in a kind of limbo. They were bullied. This environment put Child A on edge. A number
9 of times, Child A found themselves in disagreement with other students over using their new names
10 and pronouns. At some point, Child A would snap back verbally, and their teacher would only
11 catch the snapping, which while inappropriate, was understandable in context. The teacher
12 disciplined only Child A's reaction, and not its root.

13 7. Child A felt unseen and unaccepted at school, which led to self-harm and suicidal
14 ideation. Child A began cutting the skin of their palm with nail clippers. At times, Child A
15 expressed a wish that they were dead, or say that if they were dead, they "wouldn't have to deal
16 with this."

17 8. Child A asked to transfer to a school where students knew them only as
18 nonbinary, with their new name. Fortunately, our family was able to make that change, and I
19 noticed an immediate and dramatic improvement in Child A's outlook and mental health because
20 they were in a more supportive school environment and felt accepted and seen. Child A also
21 began seeing a gender-affirming mental health therapist, which helped.

22 9. Child A chooses not to be around people who misgender them, for example
23 certain relatives. Our child often expresses that the most important thing to them is not to be
24 misgendered as either male or female. The more Child A's nonbinary identity is accepted, the
25 more they thrive. I have seen firsthand over and over that acceptance of social transitioning
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1 measures, such as using Child A's preferred name and pronouns is crucial to their physical,
2 mental, and emotional health.

3 10. Our family has not yet sought gender-affirming medical care for Child A, but we
4 likely will. Child A is interested in exploring puberty blockers, because they are terrified about
5 going through bodily changes that would make them present as masculine. The topic of puberty
6 blockers came up because Child A became anxious about getting "man hair" on their legs. They
7 shave their legs. They are so afraid of puberty and looking more man-like. Our research into
8 puberty blockers led us to the Gender Clinic at Seattle Children's Hospital. We were encouraged
9 by encounters with doctors who addressed our child respectfully, using their preferred name and
10 pronouns. The doctors provided clear and careful information to our family about puberty
11 blockers and hormones. Child A was so excited to know that there is an option to provide them
12 more time to present as androgynous. We believe puberty blockers could be key to preventing
13 needless mental, emotional, even physical harm to Child A from gender dysphoria (a condition
14 recognized in the DSM-5 that involving inconsistency between an individual's gender identity
15 and the individual's sex assigned at birth). Our child innately hates being categorized as male or
16 female.

17 11. I understand that the President of the United States has issued an Executive Order
18 that effectively eliminates the option for people under 19 from receiving gender-affirming
19 medical care. The federal government's policy will have a variety of severe negative impacts on
20 my child's health and well-being. My biggest concern is that my child will be forced into
21 manhood and denied the chance to move gently into androgyny, which would lead to self-hatred
22 and self-mutilation. Not having access to gender-affirming counselors and doctors would be
23 devastating for Child A and our family, as would being forced to use their "document name,"
24 i.e., the name on their birth certificate, and not being able to have a passport with a nonbinary
25 gender marker. I cannot emphasize enough that social transition measures and the option of
26 gender-affirming healthcare are crucial for my child's physical, mental, and emotional health. I

1 am extremely worried about the self-hatred and self-harm that would likely occur if Child A
2 were denied gender-affirming care. In fact, I know it would happen because I have seen it happen
3 when my child is misgendered. That's what would happen if Child A were denied gender-
4 affirming medical care.

5 12. My child is vibrant with a wonderful imagination. They love to play Dungeons
6 & Dragons and complex board games. Right now, Child A and a friend are preparing to write a
7 fiction series inspired by "Wings of Fire," one of Child A's favorite series. They should be
8 allowed the basic freedom that everyone enjoys: to be their authentic self in public. They just
9 want to live their life and pursue the path they have chosen for their gender identity and gender
10 expression at the pace appropriate for them and without interference from the Federal
11 Government.

12 13. My family is concerned by the current climate of mistrust and hostility towards
13 transgender and gender-diverse people, and the Federal Government's promotion and
14 normalization of that environment. We are concerned that the climate will continue to worsen.
15 The federal government's toxic rhetoric, including using language such as "chemical mutilation"
16 to describe freely chosen, evidence-based gender-affirming care, places my child and our family
17 at great personal risk. The prospect of being harassed by individuals opposed to the very
18 existence of gender-diverse people, or harassed or prosecuted by the Federal Government itself,
19 prevents us from personally taking on the government and opposing the Executive Order through
20 private legal action. It is for this reason that I identify myself only by my initials and identify my
21 child as "Child A" in this declaration.


1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this _____ day of February 2025 at Seattle, Washington.

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6 S.O.
7 Parent Of Child A
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1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this 3rd day of February 2025 at Seattle, Washington.

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S.O.
6 Parent Of Child A
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